

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

WASHINGTON LAWYERS' COMMITTEE FOR
CIVIL RIGHTS AND URBAN AFFAIRS

and Employer Case 05-RC-244591

NATIONAL ORGANIZATION OF LEGAL
SERVICES WORKERS, UAW Local 2320 a/w
UNITED AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT WORKERS OF
AMERICA, AFL-CIO

Petitioner

ORDER

The Employer's Request for Review of the Acting Regional Director's Decision and Direction of Election and Supplemental Decision Overruling Objections and Certification of Representative is denied because it raises no substantial issues warranting review.¹

JOHN F. RING, CHAIRMAN

MARVIN E. KAPLAN, MEMBER

WILLIAM J. EMANUEL, MEMBER

Dated, Washington, D.C., December 11, 2019.

¹ In denying review, we observe that representation cases are not subject to the Administrative Procedure Act. See 5 U.S.C §§ 554(a)(6), 556, 557(a). Cf. *Bendix Corp.*, 150 NLRB 718, 718 fn. 1 (1964) (RC hearings "are nonadversary in nature and not within the Administrative Procedure Act").

We express no view with respect to whether we agree or disagree with the revisions made by the Board's 2014 Election Rule but agree that it applies here and warrants denial of the Employer's Request for Review.